

1895-024 Chancery Causes: Rebecca Clark vs. Robert Clark
Lee Co.

Reasor, Clarke

CH-Divorce
T-Vices

To the Honorable W. T. Miller, Judge of the Circuit Court of Lee County, Virginia:-

Humbly complaining, your oratrix, Rebecca Clark, nee Rebecca Reasor, wife of Robert Clark, would respectfully represent and shew unto your honor, that she was married to the said Robert Clark on the day of September 1891, and is now years of age. During all the time that she lived with her said husband she was unto him a good & wife, dutiful and obedient unto him in all of his lawful wishes, and in virtue remained his true wife, but notwithstanding the premises, her said husband willfully, lewdly and lasciviously and without her consent procurement or connivance, did unlawfully commit the heinous crime of adultery, and that against her earnest objections and protestations her said husband persisted in inviting and bringing to their house a lewd woman, especially at times when your oratrix was not at home, greatly to the shame of your oratrix and to her humility and unhappiness, and that because of such acts and relationships between the said Robert Clark and the said lewd woman your oratrix left her home and has endeavored to support herself by daily labor and has ever since lived separate and apart from her said husband and has not cohabited with him since said adulterous acts came to her knowledge.

Your oratrix would further represent and shew unto your honor that she is and has been for more than twelve months prior to the ~~institution~~ institution of this suit ~~born~~ a citizen of said county and state, and that the said adulterous acts here complained of occurred in less than five years preceeding this date.

In consideration whereof and in as much as your oratrix is remediless in the premises, ~~have~~ in your honors court of equity she prays ~~that~~ that the said Robert Clark be made the party defendant to this bill and required to answer the same, but not on oath that being waived, and that upon a final hearing the bonds of matrimony heretofore contracted and now existing between your oratrix and her said husband be dissolved and she granted a divorce from him a vinculo matrimonii, and that general relief be granted her and as in duty bound she will ever pray, etc. May spa issue directed, &c.

Orv. Beardsley & Co.
P. O.

Rebecca Clark

ps. 3 Bill.

Robert Lalor.

Over Blanketship & Eving
1895
2nd October rules bill filed
& Spa & cited
1895 1st Nov rules taken the
last Monday in Oct
Cause set for hearing

Circuit Court Lee County,

Jonesville, Va.,

189

Notice is hereby given to Robert Clark (col'd) that Rebecca Clark will proceed on the 21st day of October at the Residence of H. A. J. Skerrin in the town of Big Stone Gap to take the Depositions of herself and others which are intended to be read as evidence in her behalf in a case now pending in the Circuit Court of Lee County Va wherein she is pff. and Robt. Clark Deft. And if for any cause the said Depositions are not completed on said day the same will be adjourned from day to day & from place to place till the same are completed

Rebecca
Clark
Oct 19. 1896

by Cassiod

I accept ser-
vice of the
within notice
This Oct 19/96

^{his}
Robt X Clane
man

The Deposition of Rebecca Clarke taken before me,
H.A. W. Skerr, Commissioner in Chancery for Wise
County Circuit Court, at my dwelling house,
Big Stone Gap, Wise County, Virginia, on the
21st day of October, 1896, to be read as evidence
in the Chancery cause of Rebecca Clarke against
Robert Clarke, pending in Lee County Circuit
Court.

Rebecca Clarke, first being duly sworn, deposes
as follows, to-wit:

Q 1 State your age and residence—
A I am about 25 years old—My home is at Dryden but,
temporarily at Big Stone Gap.
Q 2 State if you are the wife of Robert Clarke—
A I am—

Q 3 State whether or not he has deserted you and if
he now provides for you—and if he does not pro-
vide for you, when did he quit providing for you?^(S)
also state how he treated you while living with you^(S)
and also state whether he has kept the marriage vow^(S)
A. He has left me ^{about 3}—Three years ago—He does not provide
for me now and never did, and while we lived together I had
to work and make all we lived upon. While we lived together
he would bring home with him gamblers for me to wait upon,
they would get drunk and continuously and sometimes make me
give him my money which I had worked for, to buy liquor with
and when I refused to give it to him he would often burn
up my clothing. He was always fussing and beating me with his
fists. When he was gone away from home he would come ^{back} home
and ~~he would~~ tell me he had been with women who I know
were lewd. He even brought to my house Laura Chandler
a bad woman, and kept her there all winter before we
parted. If I had objected to her being there he would
beat me. They would stay there by themselves when
I was off at work.

And further this deponent saith not.
Rebecca ^{her} Clarke
marks

Virginia, Wise County, to-wit:

I, H. A. W. Skeen, Commissioner in Chancery for Wise
County Circuit Court, do hereby certify That The deposition
of Rebecca Clarke was duly taken, sworn to and subscribed
before me, at The time, place and for The purpose in The
Caption mentioned.

Given under my hand, This The 21st. day of Oct.
1896,

H. A. W. Skeen
Comm. In Chy.

Rebecca Clarke

vs of Deposition

Robert Clarke

Received by mail in
good condition and
filed December 22nd
1896.

A. B. Murrey Clerk

The Commonwealth of Virginia,

To the Sheriff of the County of Lee--Greeting:

WE COMMAND YOU, That you summon

Robert Clark

to appear at the Clerk's Office of the Circuit Court of the County of Lee, at the rules to be held
for the said Court on the *3rd* Monday in *October*, 189*5*, to answer a
bill in Chancery, exhibited against *him* in our said court by

Rebecca Clark

And have then there this writ. Witness, A. B. MUNSEY, Clerk of our said Court, at the court-
house, the *10th* day of *October*, 189*5*, and in the

120th year of the Commonwealth.

A B Munsey Clerk.

Rebecca Clark

SUPCENA

vs.

IN

CHANCERY.

Robert Clark

Orr B. Hewing p. q.

To 2nd Oct Rules,

Circuit Court.

Executed by
delivering an
office Copy of
the within Summs
to Robert Clark
this Oct 15-1898.

J. M. Weston L.S.
For Wm. P. Weston
S.L.C.